

FILED
2022 JAN 18 AM 10:31
CLERK
U.S. DISTRICT COURT

Raland J Brunson
4287 South Harrison Blvd., Apt 132
Ogden, Utah 84403
Phone: 385-492-4898
Email: thedreamofthecentury@gmail.com
Pro Se

THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

RALAND J BRUNSON,

Plaintiff,

vs.

ALMA S. ADAMS ; et al.,

Defendants.

**OBJECTION TO REPORT
AND RECOMMENDATION (ECF 23) AND
LEAVE OF COURT FOR BRUNSON'S
PROPOSED 1ST AMENDED COMPLAINT**

Case No. 1:21-cv-00111-CMR

District Judge: Jill N. Parrish

Magistrate Judge: Jared C. Bennett

Plaintiff Raland J Brunson ("Brunson") pursuant to Fed. R. Civil P. 72(b)(2)¹ hereby moves this court with his **OBJECTION TO REPORT AND RECOMMENDATION (ECF 23)** ("Report") and states.

Brunson objects to the Report because it violates Brunson's right of due process and wrongfully advocated for Defendants to Brunson's demise.

The Report states that it gave careful consideration to the written briefs but it did not address Brunson's opposition (ECF 20) which was completely ignored. Addressing Brunson's opposition is center to procedural fairness, to be heard is a fundamental right of due process. The Report did not hear Brunson's opposition.

¹ Within 14 days after any report and recommendation has been filed a party may file an objection, Brunson's objection is timely as the recommendation was filed Jan. 6, 2021

- “The right of a litigant to be heard is one of the fundamental rights of due process of law. A denial of the right requires a reversal.” *Council Of Federated Organizations v. MIZE*, 339 F.2d 898 (5th Cir. 1964).
- “[T]imely and adequate notice and an opportunity to be heard in a meaningful way are at the very heart of procedural fairness.” (quotations, citations, and footnote omitted) *In re Worthen*, 926 P.2d at 876 (Utah 1996).
- “[E]very person who brings a claim in a court or at a hearing held before an administrative agency has a due process right to receive a fair trial in front of a fair tribunal.” *Id.* (quotations and citations omitted).” *Brent Brown Dealerships v. Tax Com’n*, MVED, 2006 UT App 261.
- (“ . . . an opportunity to be heard in a meaningful way are at the very heart of procedural fairness . . .”) *Brent Brown Dealerships v. Tax Com’n*, MVED, 2006 UT App 261.
- “A judgment is void “if the court that rendered it . . . acted in a manner inconsistent with due process.” *Richins v. Delbert Chipman & Sons Co.*, 817 P.2d 382, 385 (Utah App. 1991) (quoting *Automatic Feeder Co. v. Tobey*, 221 Kan. 17, 558 P.2d 101, 104 (1976)); accord *In Re Estate of Jones*, 858 P.2d 983, 985 (Utah 1993); *Brimhall v. Mecham*, 27 Utah 2d 222, 224, 494 P.2d 525, 526 (1972); *Workman v. Nagle Constr., Inc.*, 802 P.2d 749, 753 (Utah App. 1990)” *Jenkins v. Weis*, 868 P.2d 1374 (Utah App. 1994)

The right of due process is guaranteed by *Article 1 Section 11, and Article 1 Section 7 of the Utah Constitution and the Fourteenth Amendment of the United States Constitution.*

- Article 1 Section 11: “All courts shall be open, and every person, for an injury done to him in his person, property or reputation, shall have remedy by due course of law, which shall be administered without denial or unnecessary delay; and no person shall be barred from prosecuting or defending before any tribunal in this State, by himself or counsel, any civil cause to which he is a party.”
- Article 1 Section 7: No person shall be deprived of life, liberty or property, without due process of law.
- Fourteenth Amendment of the United States Constitution section 1: “. . . nor shall any state deprive any person of life, liberty, or property, without due process of law . . .”

Again, the Report did not address Brunson’s argument which violated Brunson’s right of due process.

Brunson paid a filing fee to be heard, to have his arguments addressed, not to be ignored.

The Report on footnote 15 cited case law showing that it is not the proper function of the court to assume the role of advocate for litigants, but then on the other hand the Report gave a legal analysis citing various cases not produced by Defendants thus advocating for Defendants in order to give Defendants their win.

In helping Defendants the Report ignored Brunson's opposition, it also ignored the Federal Tort Claims Act, the Tucker Act and title 28 U.S.C. §1331 which the court could have easily used in order to give Brunson his win. The Report showed no interest in justice only to insure that Brunson cannot pursue his claims against the Defendants.

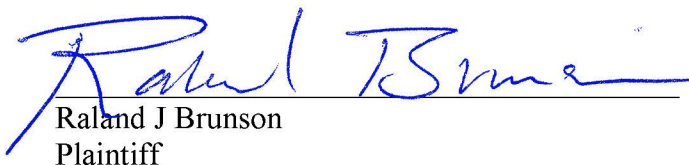
LEAVE OF COURT

Brunson also moves this court for leave to file his [Proposed] 1st Amended Complaint attached as "Exhibit A".

Changes made include the third cause of action which has been changed from breach of duty to negligence. The other causes of action were changed to more satisfy the law when alleging such causes of actions.

WHEREFORE, for the above reasons, Brunson moves this Court to reject the Report, to refrain from advocating for Defendants and to address Brunson's opposition and to grant Brunson's leave of court to file his [Proposed] 1st Amended Complaint.

Humbly submitted this the 18th day of January, 2022.


Raland J Brunson
Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 18th day of January, 2022 I personally placed in the United States Mail to the individuals named below low a true and correct copy of **OBJECTION TO REPORT AND RECOMMENDATION (ECF 23) AND LEAVE OF COURT FOR BRUNSON'S PROPOSED 1ST AMENDED COMPLAINT.**

ANDREA T. MARTINEZ
JOHN K. MANGUM
111 South Main Street, #1800
Salt Lake City, Utah 84111

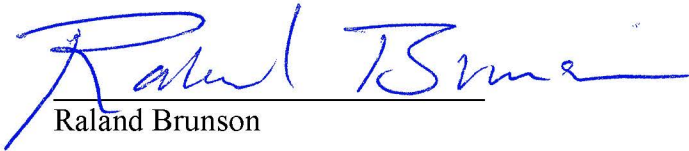

Raland Brunson

EXHIBIT A

Raland J Brunson
4287 South Harrison Blvd., Apt 132
Ogden, Utah 84403
Phone: 385-492-4898
Email: thedreamofthecentury@gmail.com
Pro Se

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

RALAND J BRUNSON,

Plaintiff,

vs.

FIRST
AMENDED COMPLAINT

Case No. 1:21-cv-00111-CMR

District Judge: Jill N. Parrish
Magistrate Judge: Jared C. Bennett

Named persons in their capacities as United States House Representatives: ALMA S. ADAMS; PETE AGUILAR; COLIN Z. ALLRED; MARK E. AMODEI; KELLY ARMSTRONG; JAKE AUCHINCLOSS; CYNTHIA AXNE; DON BACON; TROY BALDERSON; ANDY BARR; NANETTE DIAZ BARRAGÁN; KAREN BASS; JOYCE BEATTY; AMI BERA; DONALD S. BEYER JR.; GUS M. ILIRAKIS; SANFORD D. BISHOP JR.; EARL BLUMENAUER; LISA BLUNT ROCHESTER; SUZANNE BONAMICI; CAROLYN BOURDEAUX; JAMAAL BOWMAN; BRENDAN F. BOYLE; KEVIN BRADY; ANTHONY G. BROWN; JULIA BROWNLEY; VERN BUCHANAN; KEN BUCK; LARRY BUCSHON; CORI BUSH; CHERI BUSTOS; G. K. BUTTERFIELD; SALUD O. CARBAJAL; TONY CÁRDENAS; ANDRÉ CARSON; MATT CARTWRIGHT; ED CASE; SEAN CASTEN; KATHY CASTOR; JOAQUIN CASTRO; LIZ CHENEY; JUDY CHU; DAVID N. CICILLINE; KATHERINE M. CLARK; YVETTE D. CLARKE; EMANUEL CLEAVER; JAMES E. CLYBURN; STEVE COHEN; JAMES COMER; GERALD E. CONNOLLY; JIM COOPER; J. LUIS CORREA; JIM COSTA; JOE COURTNEY; ANGIE CRAIG; DAN CRENSHAW; CHARLIE CRIST; JASON CROW; HENRY CUELLAR; JOHN R. CURTIS; SHARICE DAVIDS; DANNY K. DAVIS; RODNEY DAVIS; MADELEINE DEAN; PETER A. DEFAZIO; DIANA DEGETTE; ROSAL. DELAURO; SUZAN K. DELBENE; ANTONIO DELGADO; VAL BUTLER DEMINGS; MARK DESAULNIER; THEODORE E. DEUTCH; DEBBIE DINGELL; LLOYD DOGETT; MICHAEL F. DOYLE; TOM EMMER; VERONICA ESCOBAR; ANNA G. ESHOO; ADRIANO ESPAILLAT; DWIGHT EVANS; RANDY FEENSTRA; A. DREW FERGUSON IV; BRIAN K. FITZPATRICK; LIZZIE LETCHER; JEFF FORTENBERRY; BILL FOSTER; LOIS FRANKEL; MARCIA L. FUDGE; MIKE GALLAGHER; RUBEN GALLEG0; JOHN GARAMENDI; ANDREW R. GARBARINO; SYLVIA R. GARCIA; JESÚS G. GARCÍA; JARED F. GOLDEN; JIMMY GOMEZ; TONY GONZALES; ANTHONY GONZALEZ; VICENTE GONZALEZ; JOSH GOTTHEIMER; KAY GRANGER; AL GREEN; RAÚL M. GRIJALVA; GLENN GROTHMAN; BRETT GUTHRIE; DEBRA A. HAALAND; JOSH HARDER; ALCEE L. HASTINGS; JAHANA

HAYES; JAIME HERRERA BEUTLER; BRIAN HIGGINS; J. FRENCH HILL; JAMES A. HIMES; ASHLEY HINSON; TREY HOLLINGSWORTH; STEVEN HORSFORD; CHRISSY HOULAHAN; STENY H. HOYER; JARED HUFFMAN; BILL HUIZENGA; SHEILA JACKSON LEE; SARA JACOBS; PRAMILA JAYAPAL; HAKEEM S. JEFFRIES; DUSTY JOHNSON; EDDIE BERNICE JOHNSON; HENRY C. JOHNSON JR.; MONDAIRE JONES; DAVID P. JOYCE; KAIALI'I KAHELE; MARCY KAPTUR; JOHN KATKO; WILLIAM R. KEATING; RO KHANNA; DANIEL T. KILDEE; DEREK KILMER; ANDY KIM; YOUNG KIM; RON KIND; ADAM KINZINGER; ANN KIRKPATRICK; RAJA KRISHNAMOORTHY; ANN M. KUSTER; DARIN LAHOOD; CONOR LAMB; JAMES R. LANGEVIN; RICK LARSEN; JOHN B. LARSON; ROBERT E. LATTA; JAKE LATURNER; BRENDA L. LAWRENCE; AL LAWSON JR.; BARBARA LEE; SUSIE LEE; TERESA LEGER FERNANDEZ; ANDY LEVIN; MIKE LEVIN; TED LIEU; ZOE LOFGREN; ALAN S. LOWENTHAL; ELAINE G. LURIA; STEPHEN F. LYNCH; NANCY MACE; TOM MALINOWSKI; CAROLYN B. MALONEY; SEAN PATRICK MALONEY; KATHY E. MANNING; THOMAS MASSIE; DORIS O. MATSUI; LUCY MCBATH; MICHAEL T. MCCAUL; TOM MCCLINTOCK; BETTY MCCOLLUM; A. ADONALD MCEACHIN; JAMES P. MCGOVERN; PATRICK T. MCHENRY; DAVID B. MCKINLEY; JERRY MCNERNEY; GREGORY W. MEEKS; PETER MEIJER; GRACE MENG; KWEISI MFUME; MARIANNETTE MILLER-MEEKS; JOHN R. MOOLENAAR; BLAKE D. MOORE; GWEN MOORE; JOSEPH D. MORELLE; SETH MOULTON; FRANK J. MRVAN; STEPHANIE N. MURPHY; JERROLD NADLER; GRACE F. NAPOLITANO; RICHARD E. NEAL; JOE NEGUSE; DAN NEWHOUSE; MARIE NEWMAN; DONALD NORCROSS; ALEXANDRIA OCASIO-CORTEZ; TOM O'HALLERAN; ILHAN OMAR; FRANK PALLONE JR.; JIMMY PANETTA; CHRIS PAPPAS; BILL PASCRELL JR.; DONALD M. PAYNE JR.; NANCY PELOSI; ED PERLMUTTER; SCOTT H. PETERS; DEAN PHILLIPS; CHELLIE PINGREE; MARK POCAN; KATIE PORTER; AYANNA PRESSLEY; DAVID E. PRICE; MIKE QUIGLEY; JAMIE RASKIN; TOM REED; KATHLEEN M. RICE; CATHY MCMORRIS RODGERS; DEBORAH K. ROSS; CHIP ROY; LUCILLE ROYBAL-ALLARD; RAUL RUIZ; C. A. DUTCH RUPPERSBERGER; BOBBY L. RUSH; TIM RYAN; LINDA T. SÁNCHEZ; JOHN P. SARBANES; MARY GAY SCANLON; JANICE D. SCHAKOWSKY; ADAM B. SCHIFF; BRADLEY SCOTT SCHNEIDER; KURT SCHRADER; KIM SCHRIER; AUSTIN SCOTT; DAVID SCOTT; ROBERT C. SCOTT; TERRI A. SEWELL; BRAD SHERMAN; MIKIE SHERRILL; MICHAEL K. SIMPSON; ALBIO SIRE; ELISSA SLOTKIN; ADAM SMITH; CHRISTOPHER H. SMITH; DARREN SOTO; ABIGAIL DAVIS SPANBERGER; VICTORIA SPARTZ; JACKIE SPEIER; GREG STANTON; PETE STAUBER; MICHELLE STEEL; BRYAN STEIL; HALEY M. STEVENS; STEVE STIVERS; MARILYN STRICKLAND; THOMAS R. SUOZZI; ERIC SWALWELL; MARK TAKANO; VAN TAYLOR; BENNIE G. THOMPSON; MIKE THOMPSON; DINA TITUS; RASHIDA TLAIB; PAUL TONKO; NORMA J. TORRES; RITCHIE TORRES; LORI TRAHAN; DAVID J. TRONE; MICHAEL R. TURNER; LAUREN UNDERWOOD; FRED UPTON; JUAN VARGAS; MARC A. VEASEY; FILEMON VELA; NYDIA M. VELÁZQUEZ; ANN WAGNER; MICHAEL WALTZ; DEBBIE WASSERMAN SCHULTZ; MAXINE WATERS; BONNIE WATSON COLEMAN; PETER WELCH; BRAD R. WENSTRUP; BRUCE WESTERMAN; JENNIFER WEXTON; SUSAN WILD; NIKEMA WILLIAMS; FREDERICA S. WILSON; STEVE WOMACK; JOHN A. YARMUTH; DON YOUNG; the following persons named are for their capacities as U.S. Senators; TAMMY BALDWIN; JOHN BARRASSO;

MICHAEL F. BENNET; MARSHA BLACKBURN; RICHARD BLUMENTHAL; ROY BLUNT; CORY A. BOOKER; JOHN BOOZMAN; MIKE BRAUN; SHERROD BROWN; RICHARD BURR; MARIA CANTWELL; SHELLEY CAPITO; BENJAMIN L. CARDIN; THOMAS R. CARPER; ROBERT P. CASEY JR.; BILL CASSIDY; SUSAN M. COLLINS; CHRISTOPHER A. COONS; JOHN CORNYN; CATHERINE CORTEZ MASTO; TOM COTTON; KEVIN CRAMER; MIKE CRAPO; STEVE DAINES; TAMMY DUCKWORTH; RICHARD J. DURBIN; JONI ERNST; DIANNE FEINSTEIN; DEB FISCHER; KIRSTEN E. GILLIBRAND; LINDSEY GRAHAM; CHUCK GRASSLEY; BILL HAGERTY; MAGGIE HASSAN; MARTIN HEINRICH; JOHN HICKENLOOPER; MAZIE HIRONO; JOHN HOEVEN; JAMES INHOFE; RON JOHNSON; TIM KAINE; MARK KELLY; ANGUS S. KING, JR.; AMY KLOBUCHAR; JAMES LANKFORD; PATRICK LEAHY; MIKE LEE; BEN LUJAN; CYNTHIA M. LUMMIS; JOE MANCHIN III; EDWARD J. MARKEY; MITCH MCCONNELL; ROBERT MENENDEZ; JEFF MERKLEY; JERRY MORAN; LISA MURKOWSKI; CHRISTOPHER MURPHY; PATTY MURRAY; JON OSSOFF; ALEX PADILLA; RAND PAUL; GARY C. PETERS; ROB PORTMAN; JACK REED; JAMES E. RISCH; MITT ROMNEY; JACKY ROSEN; MIKE ROUNDS; MARCO RUBIO; BERNARD SANDERS; BEN SASSE; BRIAN SCHATZ; CHARLES E. SCHUMER; RICK SCOTT; TIM SCOTT; JEANNE SHAHEEN; RICHARD C. SHELBY; KYRSTEN SINEMA; TINA SMITH; DEBBIE STABENOW; DAN SULLIVAN; JON TESTER; JOHN THUNE; THOM TILLIS; PATRICK J. TOOMEY; HOLLEN VAN; MARK R. WARNER; RAPHAEL G. WARNOCK; ELIZABETH WARREN; SHELDON WHITEHOUSE; ROGER F. WICKER; RON WYDEN; TODD YOUNG; JOSEPH ROBINETTE BIDEN JR in his capacity of President of the United States; MICHAEL RICHARD PENCE in his capacity as former Vice President of the United States, and KAMALA HARRIS in her capacity as Vice President of the United States and JOHN and JANE DOES 1-100,

Defendants.

Comes now Plaintiff, Raland J Brunson ('Brunson') in pro se, alleges against Defendants as follows:

PARTIES AND JURISDICTION

1. Plaintiff is an individual residing in Weber County, State of Utah.
2. Plaintiff voted in the 2020 Presidential Election.
3. The acts committed against Plaintiff took place while he was living and voted in Salt Lake County, State of Utah.
4. Plaintiff's right to bring this action includes, but not limited to, Amendment I of the United States Constitution which states: "Congress shall make no law respecting

an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble, and to petition the Government for a redress of grievances.” (Underline added)

5. Defendants all have an office, or workplace in Washington, DC.

6. This court has jurisdiction pursuant to 28 U.S.C. § 1331 & 1332, and the amount in controversy exceeds \$75,000.00.

BACKDROP COMMON TO ALL ALLEGATIONS

—THE OATH OF OFFICE—

7. “Let it simply be asked, where is the security for property, for reputation for life, if the sense of moral and religious obligation desert the oaths which are the instruments of investigation in courts of justice.” —*George Washington* on the sanctity of oaths.

8. The oath of office is the thread by which today the U.S. Constitution hangs.

9. The U.S. Constitution, Article VI, clause 3 states “*The Senators and Representatives before mentioned, and the Members of the several State Legislatures, and all executive and judicial Officers, both of the United States and of the several States, shall be bound by Oath or Affirmation, to support this Constitution; but no religious Test shall ever be required as a Qualification to any Office or public Trust under the United States.*”

10. The U.S. Senator Defendants have each taken this oath “*I do solemnly swear (or affirm) that I will support and defend the Constitution of the United States against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties of the office on which I am about to enter: So help me God.*”

11. The U.S. House Representative Defendants have each taken this oath as

described in 5 U.S.C. §3331 which states “I, AB, do solemnly swear (or affirm) that I will support and defend the Constitution of the United States against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties of the office on which I am about to enter. So help me God.”

12. All the Defendants have made an allegiance to God that they would support and defend the Constitution of the United States of America against all enemies, foreign and domestic.

13. The Constitution of the United States was established to protect our God given rights which are therefore unalienable. Every person on earth has these same rights.

14. The 2nd Clause of the Declaration of Independence states: "We hold these truths to be self evident, that all men are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness, -That to secure these rights, governments are instituted among Men, deriving their just powers from the consent of the governed. . .”

15. Our unalienable rights are given to us from God and therefore the Defendants have no right to legislate or enforce laws that would deny or disparage these rights without being guilty of committing crimes against Plaintiff and humanity.

16. The Utah State Supreme Court supports the fact that our rights come from God as clearly demonstrated in the case of American Bush v. City Of South Salt Lake, 2006 UT 40 140 P.3d.1235 which states “In considering State constitutions we must not commit the mistake of supposing that, because individual rights are guarded and protected by them, they must also be considered as owing their origin to them. These instruments measure the powers of the rulers,

but they do not measure the rights of the governed. . . . [A state constitution] is not the beginning of a community, nor the origin of private rights; it is not the fountain of law, nor the incipient state of government; it is not the cause, but consequence, of personal and political freedom; **it grants no rights to the people**, but is the creature of their power, the instrument of their convenience. Designed for their protection in the enjoyment of the **rights and powers which they possessed before the constitution was made**, it is but the framework of the political government . . . It presupposes an organized society, law, order, property, personal freedom, a love of political liberty, and enough of cultivated intelligence to know how to guard it against the encroachments of tyranny.” (Bold emphasis added)

17. Amendment 9 of the Constitution of the United States (known as the interpretation clause) clarifies the fact that no government has the right to misconstrue our God-given rights, it states "The enumeration in the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people." In other words, Congress has no power to enact laws that would violate our God-given rights.

18. Laws that violate our God-given rights are null and void. “[C]onsequences, manifestly contradictory to common reason, they are, with regard to those collateral consequences, void. I lay down the rule with these restrictions; though I know it is generally laid down more largely, that acts of parliament contrary to reason are void. But if the parliament will positively enact a thing to be done which is unreasonable, I know of no power that can control it: and the examples usually alleged in support of this sense of the rule do none of them prove, that where the main object of a statute is unreasonable the judges are at liberty to reject it; for that were to set the judicial power above that of the legislature, which would be subversive of all government. But where some collateral matter arises out of the general words, and happens to be

unreasonable; there the judges are in decency to conclude that this consequence was not foreseen by the parliament, and therefore they are at liberty to expound the statute by equity, and only quoad hoc disregard it.” (Brackets added) *State Ex Rel. Z.C.*, 2007 UT 54

19. Powers put into place that fail to protect our God given rights entitle mankind to “. . . dissolve the political bands which have connected them with another, and to assume among the powers of the earth, the separate and equal station to which the Laws of Nature and of Nature’s God entitle them, a decent respect to the opinions of mankind requires that they should declare the causes which impel them to the separation.” (First clause of the Declaration of Independence.)

20. The exclusive powers extended to the legislative branch of Congress for the making of laws are subject to Amendment IX of the U.S. Constitution, and as such “This Constitution, and the Laws of the United States which shall be made Pursuance thereof; . . . shall be the supreme Law of the land; . . .”. *See* Article VI, U.S. Constitution.

21. The Defendants by way of their oath of office are sworn defenders of the U.S. Constitution—the protector of our God-given rights.

22. The Defendants are sworn defenders of the U.S. Constitution bound by oath to God to defend the God-given rights of “We The People” against foreign and domestic enemies of the U.S. Constitution.

23. The U.S. Constitution was written with honor, respect and recognition of our Lord Jesus Christ as memorialized in Article VII Clause 3 which states, “. . . in the Year of our Lord . . .”, and as such the Defendants have sworn an allegiance to the author of our freedoms and liberties; our Lord Jesus Christ.

24. The Prophet Isaiah 30: 9, of the King James version of the Holy Bible states, “That this is a rebellious people, lying children, children that will not hear the law of the Lord.”

25. The “law of the Lord” spoken of by Isaiah is the U.S. Constitution as claimed by George Albert Smith.

26. On September 23, 1945, George Albert Smith, a Prophet of God of the Church of Jesus Christ of Latter-Day Saints (“Saints”) while giving a dedicatory prayer of the Idaho Temple stated, “. . . ‘for this purpose have I established the Constitution of this land . . .’ [**D&C 101:80**] . . . to fulfill the ancient prophecy of Isaiah that ‘out of Zion shall go forth the law and the word of the Lord from Jerusalem.’ [**Isaiah 2:3**]”. (*Brackets and bold emphasis added*)

27. The said D&C is the Doctrine and Covenants of the Church of Jesus Christ of Latter-Day Saints.

28. The U.S. Constitution is the instrument set up by God to protect our God-given unalienable rights.

29. The plenary power of Amendment IX of the U.S. Constitution nullifies any kind of legal protection that an enemy against the U.S. Constitution claims to have.

30. The plenary power of Amendment IX nullifies any interpretation of Amendment XII that would allow Congress to refuse an investigation into allegations that the election was rigged or affected by fraudulent votes provided by the States.

31. A rigged or fraudulent election is an attack against the U.S. Constitution especially against the equal protection clause of the 14th Amendment of the U.S. Constitution.

32. Despite the allegations supported by congressional claims of evidence showing that the November 3, 2020 U.S. Presidential general election (“Presidential Election”) was fraudulent, affecting the President of the United States, the Vice President of the United States

and members of the United States Congress, the Defendants intentionally refused to investigate the allegations backed by congressional claims of evidence in order to have Joseph Robinette Biden Jr. (“Biden”) inaugurated as President and Kamala Harris (“Harris”) inaugurated as Vice President.

33. This refusal of the Defendants to investigate the congressional claims produced by over 100 members of Congress of a rigged and fraudulent election is an act of treason.

34. A successfully rigged election has the same end result as an act of war; to place into power whom the Defendants want, which is Biden.

35. Fraud vitiates everything.

FACTS COMMON TO ALL THE ALLEGATIONS

Intentional refusal to investigate congressional claims by over 100 members of Congress of a rigged and fraudulent Presidential Election.

36. On January 6, 2021, the 117th Congress held a proceeding and debate in Washington DC (“Proceeding”). See “Exhibit 1” which is attached and is a copy of the Congressional Record (“Record”) of this Proceeding. This Proceeding was for the purpose of counting votes for the President and Vice President of the United States under Amendment XII. The following took place in this Proceeding:

37. At the top of this Proceeding the Chaplain Reverend offered a prayer and in part stated, “We have pledged to defend our Constitution against all enemies, we pray Your hedge of protection around this Nation. Defend us from those adversaries, both foreign and domestic . . . So help us, God, to serve You and this Nation with Godliness and dignity . . . we pray these things in the strength of Your holy name, Amen.” (“Prayer”)

38. After this Prayer, the pledge of allegiance was given.

39. During the Proceeding certain U.S. House representatives made allegations backed by their claims of significant evidence that exposes a fraudulently rigged Presidential Election and as such is an attack against Plaintiff's liberty and against the U.S. Constitution.

40. U.S. House Representative James Daniel Jordan ("Jordan") pointed out that there was something wrong with the Presidential election when it was found that during the campaign Biden would do an event and he would get 50 people to his event, while at just one rally President Trump would get 50,000 people. But somehow Biden, who never left his house, wins the Presidential Election.

41. The said statement alone rings with enough circumstantial evidence warranting an investigation into the Presidential Election for voter and election fraud.

42. Jordan asked Defendants Chairman Nadler and Chairwoman Maloney for an investigation into the Presidential Election who both refused.

43. Jordan stated that their refusal to allow any kind of hearing or investigation into the Presidential Election fraud was due to the fact that they wanted to ensure that President Trump would not win. This refusal shows them as conspirators involved in an act of war against the U.S. Constitution.

44. The Presidential Election was successfully uninvestigated which disenfranchised the American voters including Plaintiff's vote.

45. The Presidential Election was intentionally not investigated by Defendants including those involved on a large scale who had power to keep it from being investigated for any fraud or crimes, and who had the power to keep certain members of our judicial branch of Government from refusing to rule on the evidence of the fraud presented to them.

46. Jordan went on to allege identifying acts connecting to and leading up to election and voter fraud which were not investigated, he went on to say;

- a. that On July 31, 2016 Jim Comey's FBI takes out an insurance policy; opens an investigation on the President Trump based on nothing;
- b. and then on May 17, 2017 Mueller was named special counsel. Two years they investigate the Russia hoax. Nineteen lawyers, 40 agents and 40 million dollars of taxpayer money for nothing;
- c. and then on December 18, 2019 Democrat House Members voted to impeach President Trump based on an anonymous whistleblower with no firsthand knowledge, who was biased against the President and who worked for Biden,
- d. and then after these attempts failed, they unconstitutionally changed the election laws of Arizona, Pennsylvania, Georgia, Michigan, Nevada, and Wisconsin.

47. The election laws that were changed in the said States violated the separation of powers doctrine stealing the election from Trump for Biden's win.

48. During the Proceeding, U.S. House Representative Andrew S. Biggs ("Biggs"), produced 1,000 affidavits in support of the allegations that the Presidential Election was rigged giving Biden his win.

49. Also, Biggs identified more acts of a rigged election by laying before the Proceeding a letter ("Letter") dated December 31, 2020 addressed to Defendant Vice President Michael Richard Pence ("Pence") from Kelly J. Townsend ("Townsend") (whom at that time was a Senator-Elect) who attested in the Letter that;

- a. as the Chairwoman of the Arizona House Elections, she experienced several occurrences thwarting their ability to investigate election fraud surrounding the Presidential Election,
- b. and on December 14th, 2020, Arizona sent an alternate slate of electors, along with a resolution from 21 current and 8 newly elected legislators asking Defendant Pence to refrain from accepting the Biden electors until they could adequately investigate claims of fraud,
- c. and that she requested an Election Committee discovery hearing in order to invoke subpoena power to acquire the voting machines and ballots in order to do a comprehensive and forensic audit, which was denied,
- d. and she said that probable tampering with the voting machines existed, and that a group of AZ citizens uncovered a minimum of over 100,000 fraudulent votes supported by over 1000 affidavits,
- e. and on December 9, the Senate President authorized a hearing via the Judiciary committee that did result in subpoenas to the Maricopa County Supervisors (who oversee the elections process) that they had not yet, as of the date of her letter, been complied with, and;
- f. she further stated that because they had been met with strong obstruction at every turn as itemized in exhibit A of her letter, she moved Pence to not accept the electors until a resolution of the said matters had been made.

50. The allegations found in Townsend's Letter, including her exhibit A, is incorporated as though her allegations are fully stated herein.

51. During the proceeding, U.S. House Representative Morris Jackson "Mo" Brooks stated that for years the news media and the Democrats have deceived America about the Trump-Russia collusion and the existence of foreign interference in the 2016 elections.

52. Mo also stated that in 2020 Democrats promoted massive foreign interference in American elections by helping illegal aliens and other noncitizens vote in American elections, thereby canceling the votes of and stealing elections from American citizens.

53. Mo provided Exhibits A-J of compelling and irrefutable evidence that had only the lawful votes cast by eligible American citizens been counted, Biden lost, and President Trump won the electoral college.

54. The allegations made by Mo along with his said exhibits are incorporated as though they are fully stated herein.

55. Mo stated it was his constitutional duty to promote honest and accurate elections by rejecting electoral college vote submissions from States whose electoral systems are so badly flawed as to render their vote submissions unreliable, untrustworthy, and unworthy of acceptance. The oath of office requires all members of U.S. Congress to do the same.

56. The Proceeding provides additional strong allegations with the claim of irrefutable evidence proving beyond a reasonable doubt that the Presidential Election was rigged in every single State of the United States of America giving Biden and Harris a fraudulent win.

57. The allegations claiming that Biden had a fraudulent win was accomplished by, but not limited to, the illegal changing of both state and federal election laws, the counting of fraudulent / illegal votes favoring Biden wherein the number of submitted ballots exceeded the number of registered voters, and the voting machines fraudulently switched Trump votes to Biden.

58. The said allegations and claims that the Presidential Election was rigged are nothing short of stealing the election from Plaintiff and legitimate honest voters which was protected by; 1) the denial of investigations, 2) by the mainstream news media who almost on a daily basis discredited election and voter fraud allegations during relevant times, and these allegations were made without any investigation made on their part, 3) by social media giants who discredited and silenced allegations of election and voter fraud, 4) by many members of the Executive Branch of Government such as State and Federal prosecuting attorneys, 5) by members of the Judicial Branch of Government—Article III courts, 6) and by members of the Legislative branches of Government found in both State and Federal levels.

59. The protection was so widespread that it included all the Defendants who made wild claims without any investigation that the election was honest, fair and that there was no fraud of any kind affecting the outcome of the Presidential Election. The Defendants conspired in giving aid and comfort to enemies of the U.S. Constitution.

60. Despite the overwhelming preponderance of evidence presented throughout the Proceeding and found elsewhere that is readily available and continues to be exposed, all proving Biden's win was fraudulent, the Defendants refused to investigate the allegations of a fraudulent and rigged election thus holding fast to the lies that Biden won an honest election.

61. The Defendants pushed these lies with the cry that the Presidential Election was the most honest in history and that many courts of law agreed.

62. Additionally, Defendant Mike Lee stated, “We each have to remember that we swore an oath to uphold, protect and defend this document, written nearly two and a half centuries ago by wise men raised up by God for that very purpose. That document makes clear what our role is and what it isn’t. It makes clear who does what when it comes to deciding

Presidential elections. . . Then comes the 12th Amendment . . . Our job is to open and then count. Open then count —that is it. That is all there is.”

63. The oath of office does not allow Congress to count fraudulent votes.

64. The serious congressional allegations of voter and election fraud and that the Presidential Election was rigged, under the sacred duty of Defendants oath of office, they were required to investigate these allegations prior to their duty to “Open then count”.

65. As an example, Lee as a attempt to faithfully execute his duty secured by a contract as a bus driver, full of passengers, refuses to investigate the claims from 100 mechanics that his brakes will fail.

66. The congressional level of allegations that the Presidential Election was racked with fraud and rigged does not allow the 12th Amendment to commence until allegations of fraud are investigated and resolved. Fraud vitiates everything it touches.

67. Then Defendant Steny H. Hoyer stated, “We, the Member of Congress, who swore an oath before God to preserve and protect the Constitution of the United States and our democracy, must do so now.”

68. The Defendants correctly espoused their duty under their oath of office, and then they knowingly mocked their oaths and the opening Prayer by becoming the very enemies of the U.S. Constitution, which they swore to protect by refusing to investigate the allegations of a fraudulent and rigged Presidential Election.

69. The 12th Amendment cannot be construed to allow allegations of fraudulent votes to be counted, if so then it stands in direct conflict with their oaths of office. Defendants cannot be sworn protectors and defenders of the U.S. Constitution and then be its enemy under the auspices of the 12th Amendment. This is treason.

70. The Defendants claim the U.S. Constitution was inspired by God, and then they mocked God by refusing to investigate the allegations of a rigged and fraudulent Presidential Election thus potentially allowing a criminal to steal an election and then to be crowned its victor. —“Thou shalt not steal” has no meaning to the Defendants because they falsely claimed it was nullified by the 12th Amendment.

71. For the reasons stated above, the intentional disregard to investigate the Presidential Election for voter and election fraud was a levy of war and an attack against Brunson’s constitutional protected right to participate in a honest and fair election. In addition it was an act of war against the U.S. Constitution and the United States of America.

72. To those Defendants who suffer a sense of wrongdoing will be freed when they accept their wrong doing.

FIRST CAUSE OF ACTION
(Promissory Estoppel Count I — as to all the Defendants)

73. Plaintiff hereby incorporates all preceding and foregoing paragraphs including all Exhibits attached to this Complaint as though set forth fully herein.

74. Promissory Estoppel Count I – Failure to protect Brunson’s right to vote in an honest and fair election.

75. As stated above, each of the Defendants have taken the required binding Oath of Office respective to their offices as either a U.S. Senator, U.S. House member, President, and Vice President of the United States. This oath is also a promise made to Brunson that they would not disenfranchise his vote by failing to investigation the said allegations of a fraudulent and rigged Presidential Election.

76. Each of these Defendants made a promise under their said oaths, which constitutes an oath to Brunson, and to “We The People”, that they would ensure an honest and fair election.

77. Article IV Section IV of the U.S. Constitution states, “The United States shall guarantee to every State in this Union a Republican Form of Government.” Voting is the greatest power an individual can exercise in a Republic; it is their voice and the way citizens protect their Constitutional rights and the U.S. Constitution.

78. An honest and fair election can only be supported by legal votes, this is sacred. It is the basis of our U.S. Republican Form of Government protected by the U.S. Constitution. The efforts made, as stated above, that avoided an investigation of how Biden won the election, is an act of treason and an act of levying war against the U. S. Constitution which violated Brunson’s right to vote in an honest and fair election and as such it wrongfully invalidated his vote.

79. The Defendants refusal to investigate the serious allegations that the Presidential Election was rigged, as stated above, ran contrary to their oath to ensure an honest and fair election.

80. Brunson relied upon the Defendants promise for a fair and honest election when he cast his vote in the Presidential Election.

81. During the Proceeding, the votes of the electors affecting the Presidential Election that were presented for counting were cased with allegations of fraud as stated above. On account of this, all of the Defendants were required by oath to protect Brunson’s right to vote in an honest and fair election by rejecting the elector votes until an investigation could be made. This they did not do. By failing to do this they wrongfully, unconstitutionally, and in violation of their oaths to Brunson, invalidated Brunson’s vote.

82. Failing to investigate how Biden won the election reaches the same effect as though fraudulent votes were counted to give him his win. This invalidated Brunson's vote so that he could not participate in an honest and fair election.

83. The said oath of office requires that the Defendants must fight against all enemies of the U.S. Constitution for Brunson and "We The People". Furthermore the 9th and 12th Amendments do not allow for the counting of fraudulent votes because in so doing it fails to protect the U.S. Constitution thus protecting Brunson's right to vote in an honest and fair election.

84. For the reasons stated herein, the intentional blocking of any investigation by Defendants was an attack against Brunson's right to vote in an honest and fair election.

85. The Defendants intentional blocking of an investigation into the allegations of election and voter fraud aided and abetted this fraud, and it violated Brunson's right to vote in an honest and fair election.

86. The Defendants all failed to protect the U.S. Constitution by thwarting the said investigation which invalidated Brunson's vote. In this manner, they denied Brunson's right to vote in a fair and honest election which also identified the Defendants as enemies of the U.S. Constitution.

87. As to Defendants Biden, Pelosi, Harris and Pence, in addition to violating their oaths by refusing to protect Brunson's right to vote in an honest election, they also had direct ties ensuring that no said investigation would take place into how Biden won the election. This was done to ensure that Trump would not win while also ensuring that they, except for Pence, would win their own elections, and also to invalidate Brunson's vote thus setting a precedence that Brunson's vote would never be validated for any future Federal or State elections.

SECOND CAUSE OF ACTION
(Promissory Estoppel Count II — as to all Defendants)

88. Plaintiff hereby incorporates all preceding and foregoing paragraphs including all Exhibits attached to this Complaint as though set forth fully herein.

89. Promissory Estoppel Count II – giving aid and comfort to enemies of Brunson’s right to vote in an honest and fair election.

90. The Defendants outright refusal to investigate the allegations of a rigged and fraudulent Presidential Election purposely gave aid and comfort to the enemies of the U.S. Constitution whose desire was to wrongfully invalidate Brunson’s vote in violation of Brunson’s right to have an honest and fair election.

91. The Defendants had constructive knowledge of the allegations of evidence that there was voter and election fraud of the Presidential Election, and against these allegations, they refuted this information and claimed without any investigation that the election was transparent and honest, and as such invalidated Brunson’s vote.

92. As to Defendants Biden, Pelosi, Harris and Pence, in addition to violating their oaths by refusing to investigate the allegations of a rigged and fraudulent Presidential Election, this violation gave aid to enemies of Brunson’s right to vote in an honest and fair election, they also had direct ties ensuring that no said investigation would take place into how Biden won the election. This was done to ensure that Trump would not win while also ensuring that they, except for Pence, would win their own elections, and also to invalidate Brunson’s vote thus setting precedence that Brunson’s vote would never be validated for any future Federal or State elections.

THIRD CAUSE OF ACTION
(Negligence — as to all the Defendants)

93. Plaintiff hereby incorporates all preceding and foregoing paragraphs including all Exhibits attached to this Complaint as though set forth fully herein.

94. As per the Defendants oath of office, they each had a legal duty to protect Brunson's right to vote in an honest and fair election.

95. As stated above, the Defendants had a legal duty to investigate the allegations of a fraudulently Presidential Election which they refused to do.

96. Defendants had a duty under their oath of office to protect Brunson's right to vote in an honest and fair election by investigating the said claims that the Presidential Election was rigged in favor of Biden. Defendants refused such an investigation which damaged Brunson by invalidated Brunson's vote.

FOURTH CAUSE OF ACTION
(Intentional Infliction of Emotional Distress — as to all the Defendants)

97. Plaintiff hereby incorporates all preceding and foregoing paragraphs including all Exhibits attached to this Complaint as though set forth fully herein.

98. Each of the Defendants took their oath of office without any mental reservations knowing full well what it meant with a strong will to never violate it. The Prayer was a solemn witness to this in addition to Defendant Senator Mike Lee's statement as said above.

99. As stated above, the oath of office is also a promise to Brunson.

100. The Defendants during the Proceeding gave a witness of their duty to keep their oath of office.

101. The Defendants during the Proceeding purposely and maliciously violated their oath of office when they refused to conduct an investigation as to why Biden won the Presidential Election.

102. This extreme and outrageous conduct was a direct attack against Brunson's right to vote in an honest and fair election. It also gave aid and comfort to the enemies of the U.S. Constitution and was an act of treason by each of the Defendants.

103. The Defendants violation of the oath of office was a complete disregard to the votes of "We The People", and to Brunson's vote, along with his right to vote in a honest and fair election, causing extreme sever and emotional shock and distress to Brunson.

104. The Defendants who so easily violated Brunson's right to vote in an honest and fair election caused Brunson severe emotional damage. This damage causes fear that Defendants are now on a course to violate Brunson's right to freely travel, to make a living, to have privacy, to own property and essentially destroying his liberties.

105. Brunson's daily emotional distress and suffering finds moments of relief when Brunson envisions that the Defendants, especially Biden, Harris, Pelosi, Schumer, Schiff, Cortez and Omar will all soon be thoroughly investigated for high treason.

FIFTH CAUSE OF ACTION
(Fraud— as to all the Defendants)

106. Plaintiff hereby incorporates all preceding and foregoing paragraphs including all Exhibits attached to this Complaint as though set forth fully herein.

107. The Proceeding specifically identifies the date, where and each of the Defendants.

108. Defendants represented to Brunson that they would protect his vote and his voting rights pursuant to their oath of office which they took on the day they took office.

109. For the Presidential Election Brunson cast his vote which the Defendants swore to protect which they intentionally did not do as stated above.

110. Before Brunson cast his vote, he knew that the Proceeding would be by those individuals who would take, or had taken, the oath of office, therefore he was confident in feeling secure by their oath of office that his vote would be validated.

111. Those Defendants who took their oath of office after Brunson cast his vote knew that Brunson would be relying upon them to validate his vote.

112. The Defendants induced Brunson to vote by way of their promises made to Brunson that his vote would be validated in an honest and fair election. They did this to give the appearance that the election was fair and honest which they claimed during the Proceeding.

113. Brunson relied upon and was induced by Defendant's promises (oath of office) to cast his vote for the Presidential Election. He did not know or even imagine that the Defendants would not keep their promise.

114. Brunson did not know that the Defendants during the Proceeding would fraudulently use a tactic to invalidate Brunson's vote by refusing to do any investigation into the allegation that the Presidential Election was rigged. This intentional act fraudulently invalidated Brunson's vote.

115. Defendants wanted Brunson and "We The People" to believe their claim that they made during the Proceeding that the Presidential Election was fair and honest as though an investigation had produced this finding when in fact no investigation had been done at all.

116. The fact that the Defendants fraudulently did not validate Brunson's vote in an honest and fair election deprived Brunson of his U.S. Citizenship because his vote is an essential element of his Citizenship, and 1) it inhibits his freedom of association for political groups. Parity of resources among political groups to persuade, and 2) it violates Brunson's right of purpose to listen to informed debates with equal opportunities to persuade.

117. Voting is the greatest power an individual can exercise in this U.S. Republic; it is their voice and the way citizens protect their Constitutional rights and the U.S. Constitution. Defendants outright refusal to investigate the allegations of a fraudulent and rigged Presidential Election took this power away from Brunson.

118. Defendants have damaged/violated Brunson of his sacred right and unalienable right to cast a vote in an honest and fair election by purposely refusing to investigate the allegations of a fraudulent and rigged Presidential Election.

119. The number of damages Defendants inflicted upon Brunson as stated under this cause of action is impossible to fully incorporate herein.

120. Article III Section III of the United States Constitution states, “Treason against the United States, shall consist only in levying war against them, or in adhering to their enemies, giving them aid and comfort.” The Defendants committed acts of treason and committed fraud against Brunson by denying his right to cast a vote in an honest and fair election.

121. Biden and Harris both intentionally thwarted the said investigation which constitutes that they ran a fraudulent campaign and as such aligned themselves as being enemies of the U.S. Constitution and have committed acts of treason and committed fraud against Brunson by denying his right to cast a vote in an honest and fair election.

122. Defendant Pelosi with her direct ties to thwarting the said investigation constitutes acts of treason and committed fraud against Brunson by denying his right to cast a vote in an honest and fair election.

123. Defendant Pence received a Letter warning him that the Presidential Election had been rigged and instead of pursuing an investigation into this warning, Pence participated in the Proceeding, which was fraudulent for the lack of the said investigation, which means he

committed acts of treason, and committed fraud against Brunson—wrongfully invalidating Brunson’s vote.

124. Defendants defrauded the American people and Brunson of their right to vote in an honest and fair election by intentionally failing to allow the said investigation.

125. As stated herein, Defendants had full constructive knowledge that the said investigation should have taken place, and outrageously refused.

126. Pelosi and Pence with their powers of seat could have ensured the said investigation to take place, but instead they ensured the exact opposite and allowed the Proceeding to take place, which fraudulently invalidated Brunson’s vote.

127. The Defendants induced Brunson to vote with their promises that it would be validated. They falsely represented to Brunson, by making the claim that his vote supported an honest and fair election for Biden’s win, when in fact the Defendants fraudulently invalidated Brunson’s vote, as stated above, to give Biden his win, and as such the Defendants fraudulently and willfully damaged Brunson as stated herein. The Defendants did this with full constructive knowledge.

SIXTH CAUSE OF ACTION
(Civil Conspiracy – as to all the Defendants)

128. Plaintiff hereby incorporates all preceding and foregoing paragraphs including all Exhibits attached to this Complaint as though set forth fully herein.

129. Each of the causes of actions stated herein tie into this cause of action.

130. Defendants all worked in concert committing civil conspiracy during the Proceeding which identifies the date, where and who was all involved.

131. During the Proceeding and as outlined above, all of the Defendants were given constructive knowledge from over 100 members of Congress that the election was rigged. It was

Defendants object and course of action to deny this knowledge in order to skirt any kind of investigation into whether or not the election was indeed rigged.

132. As outlined above it was unlawful for the Defendants to have purposely refused any kind of an investigation into how Biden won the election.

133. Defendants' unlawful refusal to have an investigation as to how Biden won the election constituted serious damage against Brunson; it violated his vote along with his right to vote, and the free exercise of his citizenship as explained above.

WHEREFORE Plaintiff prays for relief against the Defendants as follows:

Relief Under the First Cause Of Action:

134. Defendants are to be removed from office with an order that they never be allowed to serve in any government office found anywhere in the United States of America nor serve in the legal profession for the rest of their lives.

135. Defendants shall be forbidden to collect any further payments, or retirements, or income derived from the U.S. Government for their services rendered to the U.S. Government.

136. Judgment against Defendants shall incorporate the fact that each of the Defendants failed to protect the U.S. Constitution, which invalidated Brunson's vote.

137. Judgment against the Defendants shall incorporate the fact that each of the Defendants gave aid and comfort to enemies of the U.S. Constitution which invalidated Brunson's vote.

138. Judgment against the Defendants shall incorporate a recommendation that the Defendants should be investigated for treason.

139. Defendants, except for Biden, Pelosi, Harris and Pence, shall each pay \$1,000,000 (One Million Dollars payable in United States legal tender money).

140. As to Defendants Pelosi, Biden, Harris and Pence, they each shall pay \$25,000,000 (Twenty-Five Million Dollars payable in United States legal tender money).

141. And it shall be ordered that former President Trump immediately be allowed to be inaugurated President of the U.S.A.

Relief Under the Second Cause Of Action:

142. Defendants are to be removed from office with an order that they are never to be allowed to serve in any government office found anywhere in the United States of America nor serve in the legal profession for the rest of their lives.

143. Defendants shall be forbidden to collect any further payments, or retirements, or income derived from the U.S. Government for their services rendered to the U.S. Government.

144. Judgment against Defendants shall incorporate the fact that each of the Defendants failed to protect the U.S. Constitution, which invalidated Brunson's vote.

145. Judgment against the Defendants shall incorporate the fact that each of the Defendants gave aid and comfort to enemies of the U.S. Constitution which invalidated Brunson's vote.

146. Judgment against the Defendants shall incorporate a recommendation that the Defendants should be investigated for treason.

147. Defendants, except for Biden, Pelosi, Harris and Pence, shall each pay \$1,000,000 (One Million Dollars payable in United States legal tender money).

148. As to Defendants Pelosi, Biden, Harris and Pence they each shall pay \$25,000,000 (Twenty-Five Million Dollars payable in United States legal tender money).

149. It shall be ordered that former President Trump immediately be allowed to be inaugurated President of the U.S.A.

Relief Under the Third Cause Of Action:

150. Defendants are to be removed from office with an order that they are never to be allowed to serve in any government office found anywhere in the United States of America nor serve in the legal profession for the rest of their lives.

151. Defendants shall be forbidden to collect any further payments, or retirements, or income derived from the U.S. Government for their services rendered to the U.S. Government.

152. Judgment against Defendants shall incorporate the fact that each of the Defendants failed to protect the U.S. Constitution which invalidated Brunson's vote.

153. Judgment against the Defendants shall incorporate the fact that each of the Defendants gave aid and comfort to enemies of the U.S. Constitution which invalidated Brunson's vote.

154. Judgment against the Defendants shall incorporate a recommendation that the Defendants should be investigated for treason.

155. Defendants, except for Biden, Pelosi, Harris and Pence, shall each pay \$1,000,000 (One Million Dollars payable in United States legal tender money).

156. As to Defendants Pelosi, Biden, Harris and Pence they each shall pay \$25,000,000 (Twenty-Five Million Dollars payable in United States legal tender money).

157. It shall be ordered that former President Trump immediately be allowed to be inaugurated President of the U.S.A.

Relief Under the Fourth Cause of Action:

158. Defendants are to be removed from office with an order that they are never to be allowed to serve in any government office found anywhere in the United States of America nor serve in the legal profession for the rest of their lives.

159. Defendants shall be forbidden to collect any further payments, or retirements, or income derived from the U.S. Government for their services rendered to the U.S. Government.

160. Judgment against Defendants shall incorporate the fact that each of the Defendants failed to protect the U.S. Constitution which invalidated Brunson's vote.

161. Judgment against the Defendants shall incorporate the fact that each of the Defendants gave aid and comfort to enemies of the U.S. Constitution which invalidated Brunson's vote.

162. Judgment against the Defendants shall incorporate a recommendation that the Defendants should be investigated for treason.

163. Defendants, except for Biden, Pelosi, Harris and Pence, shall each pay \$1,000,000 (One Million Dollars payable in United States legal tender money).

164. As to Defendants Pelosi, Biden, Harris and Pence they each shall pay \$25,000,000 (Twenty-Five Million Dollars payable in United States legal tender money).

165. It shall be ordered that former President Trump immediately be allowed to be inaugurated President of the U.S.A.

Relief under the Fifth Cause of Action.

166. Defendants are to be removed from office with an order that they are never to be allowed to serve in any government office found anywhere in the United States of America nor serve in the legal profession for the rest of their lives.

167. Defendants shall be forbidden to collect any further payments, or retirements, or income derived from the U.S. Government for their services rendered to the U.S. Government.

168. Judgment against Defendants shall incorporate the fact that each of the Defendants failed to protect the U.S. Constitution which invalidated Brunson's vote.

169. Judgment against the Defendants shall incorporate the fact that each of the Defendants gave aid and comfort to enemies of the U.S. Constitution which invalidated Brunson's vote.

170. Judgment against the Defendants shall incorporate a recommendation that the Defendants should be investigated for treason.

171. Defendants, except for Biden, Pelosi, Harris and Pence, shall each pay \$1,000,000 (One Million Dollars payable in United States legal tender money).

172. As to Defendants Pelosi, Biden, Harris and Pence they each shall pay \$25,000,000 (Twenty-Five Million Dollars payable in United States legal tender money).

173. It shall be ordered that former President Trump immediately be allowed to be inaugurated President of the U.S.A.

Relief under the Sixth Cause of Action.

174. Defendants are to be removed from office with an order that they never be allowed to serve in any government office found anywhere in the United States of America nor serve in the legal profession for the rest of their lives.

175. Defendants shall be forbidden to collect any further payments, or retirements, or income derived from the U.S. Government for their services rendered to the U.S. Government.

176. Judgment against Defendants shall incorporate the fact that each of the Defendants failed to protect the U.S. Constitution, which invalidated Brunson's vote.

177. Judgment against the Defendants shall incorporate the fact that each of the Defendants gave aid and comfort to enemies of the U.S. Constitution which invalidated Brunson's vote.

178. Judgment against the Defendants shall incorporate a recommendation that the Defendants should be investigated for treason.

179. Defendants, except for Biden, Pelosi, Harris and Pence, shall each pay \$1,000,000 (One Million Dollars payable in United States legal tender money).


180. As to Defendants Pelosi, Biden, Harris and Pence, they each shall pay \$25,000,000 (Twenty-Five Million Dollars payable in United States legal tender money).

181. And it shall be ordered that former President Trump immediately be allowed to be inaugurated President of the U.S.A.

182. **TOTAL AMOUNT OF MONEY DAMAGES:** \$2,905,000,000 (2 Billion 905 million dollars)

183. And for any such other relief that the Court may deem proper.

Dated this the 17th day of January, 2022.


Raland J Brunson
Plaintiff